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Attorneys for Defendants

DAUGHTERS OF CHARITY HEALTH SYSTEM, DAUGHTERS OF CHARITY OF ST.
VINCENT DE PAUL PROVINCE OF THE WEST, DAUGHTERS OF CHARITY MINISTRY
SERVICES CORPORATION, ROBERT ISSAI, STEPHANIE BATTLES, AND MIKE
STUART

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

LYNN MORRIS, et al.,

Plaintiffs,

v.

DAUGHTERS OF CHARITY HEALTH
SYSTEM, et al.,

Defendants.

Case No. 3:14-cv-04681-VC

**STIPULATION AND ~~PROPOSED~~
ORDER TO VACATE CASE
MANAGEMENT CONFERENCE AND
ASSOCIATED DEADLINES AND TO
SET BRIEFING SCHEDULE**

1 WHEREAS, Plaintiffs Lynn Morris, Caroline Plaza, Veronica Tench, Jacqueline
2 Murray, Maidaflor Maybir, Jocelyn Manacmul, Donna Gutierrez, Eleanore de Dios, and Elenita
3 Santos-Funai (collectively, the "Plaintiffs") filed the Complaint in this civil action on October
4 21, 2014.

5 WHEREAS, on November 18, 2014, the Plaintiffs and Defendants Daughters of Charity
6 Health System, Daughters of Charity of St. Vincent De Paul Province of the West, Daughters of
7 Charity Ministry Services Corporation, Robert Issai, Stephanie Battles, and Mike Stuart
8 (collectively, the "Defendants") filed a stipulation extending the time for Defendants to answer
9 or otherwise respond to Plaintiffs' Complaint to December 31, 2014.

10 WHEREAS, on December 26, 2014, the Plaintiffs and the Defendants filed a stipulation
11 extending the time for the Defendants to file a Motion to Dismiss, Motion to Stay, Answer or
12 otherwise respond to Plaintiffs' Complaint to January 15, 2015.

13 WHEREAS, the Defendants filed a Motion to Stay on January 15, 2015.

14 WHEREAS, the initial Case Management Conference ("CMC") in this case is set for
15 January 29, 2015, and certain associated deadlines (involving the Joint Case Management
16 Statement, the Proposed Case Management Order, and the Rule 26(f) Report) are set for January
17 20, 2015.

18 WHEREAS, counsel for the Plaintiffs and counsel for the Defendants have conferred
19 and agreed that it is in the best interests of all parties and would promote judicial efficiency to
20 vacate the CMC and associated deadlines until the Motion to Stay is resolved and to set a
21 schedule for the briefing and hearing of the Motion to Stay, except both parties agree to
22 exchange initial disclosures by January 22, 2015. While Plaintiffs reserve the right to move for
23 a preliminary injunction and for early discovery, Defendants will oppose injunctive relief and/or
24 early discovery for reasons including, but not limited to, those stated in the Motion to Stay and
25 under the Federal Rules of Civil Procedure.

26 NOW, THEREFORE, the Plaintiffs and the Defendants, by and through their respective
27 counsel, hereby stipulate as follows:
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2 Dated: January 20, 2015

By /s/ Margaret Hasselman

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13 Attorneys for Plaintiffs
14 LYNN MORRIS, CAROLINE PLAZA,
15 VERONICA TENCH, JACQUELINE
16 MURRAY, MAIDAFLO MAYBIR,
17 JOCELYN MANACMUL, DONNA
18 GUTIERREZ, ELEANORE DE DIOS, AND
19 ELENITA SANTOS-FUNAI

20 **~~PROPOSED~~ ORDER**

21 **PURSUANT TO STIPULATION, IT IS SO ORDERED**

22 Dated: January 21, 2015

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Hon. Vince Chhabria

U.S. District Judge

FILER'S ATTESTATION

I, Richard L. Gallagher, Jr., am the ECF User whose identification and password are being used to file this STIPULATION AND [PROPOSED] ORDER TO VACATE CASE MANAGEMENT CONFERENCE AND ASSOCIATED DEADLINES AND TO SET BRIEFING SCHEDULE. In compliance with Civil L.R. 5-1(i)(3), I hereby attest that counsel for Plaintiffs concur in this filing.

By /s/ Richard L. Gallagher, Jr.
Richard L. Gallagher, Jr.